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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LIMA JEVREMOVIĆ, an individual; and
AUTONOMOUS USER REHABILITATION
AGENT, LLC, a Delaware Limited Liability
Company,

Plaintiffs,

vs.

BRITTANY JEREAM COURVILLE, an
individual; PREM BENIPAL, an individual;
and THAT SURPRISE WITNESS LLC, a
New Jersey limited liability corporation.

Defendants.

Civil Action No: 3:22-cv-04969-ZNQ-RLS

Document Electronically filed

**VERIFIED SECOND AMENDED
COMPLAINT FOR:**

1. LIBEL

2. LIBEL

**3. INVASION OF PRIVACY –
INTRUSION UPON SECLUSION**

**4. INVASION OF PRIVACY – FALSE
LIGHT**

**5. DOMESTIC VIOLENCE ACT—
HARASSMENT (N.J.S.A. § 2C:25-
19(a)(13))**

**6. DOMESTIC VIOLENCE ACT—
CYBER-HARASSMENT (N.J.S.A. §
2C:25-33-4.1)**

**7. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS**

**8. NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS**

9. UNFAIR COMPETITION

10. UNFAIR COMPETITION

DEMAND FOR JURY TRIAL

Plaintiffs Lima Jevremović (“Jevremović”), an individual with her principal residence in the State of California, and Autonomous User Rehabilitation Agent, LLC, a limited liability company with its principal place of business in the State of Washington (“AURA” or the “Company”) (together, “Plaintiffs”), by and through their undersigned counsel, file this Second Amended Complaint against Defendant Brittany Jeream Courville (“Courville”) and Defendant Prem Benipal (“Benipal”) (collectively “Individual Defendants”), and Defendant That Surprise Witness TV LLC (the “Entity Defendant”) (all collectively, “Defendants”), on the basis of libel¹ and additional causes

¹ Plaintiffs respectfully disagree with the Court’s finding that no libel claims have been stated. In part to preserve the issue for appeal, Plaintiffs replead and amended the libel claims, given that “if plaintiff simply drops the dismissed claim

of action for harassment, cyber-harassment, intentional/negligent infliction of emotional distress, and unfair competition, arising from the conduct of Defendants.

STATEMENT OF THE CASE

This action arises out of the conduct of Courville, in concert with Defendant Benipal, and the Entity Defendant to weaponize the social media handle “That Surprise Witness” on various forms of social media in a concerted campaign to bring down and “cancel” Jevremović and to destroy AURA’s business, vowing to try “to stop [AURA] before it even gets off the ground.”² More recently, the Defendants began to pivot towards a more dangerous campaign of cyber-harassment and doxing, with Courville promising that her activities will continue or worsen until Jevremović drops this very lawsuit.³

Defendants, in a concerted and premeditated effort to build on the worst trends in online harassment and doxing, have courted the forces behind Q-Anon⁴, and have resorted to implementing the use of non-public, HIPAA protected video footage of Jevremović’s family

and does not attempt to replead, the claim will be deemed waived and plaintiff will not be able to raise the original dismissal of the cause of action on appeal.” Federal Civil Procedure Before Trial (Rutter Group 2023). Plaintiffs continue to strongly believe that they properly stated claims for libel in the Complaint, and Plaintiffs attempt to amend Plaintiffs’ libel claims in a way that will make this more apparent, which Plaintiffs will further argue in the event that Defendants file a new motion to dismiss. In addition, Plaintiffs plead new, additional facts which, even accepting this Court’s prior findings, constitute proper libel claims.

² @That Surprise Witness, Instagram video, at time stamp 7:23 <https://www.instagram.com/p/Ca2DuTfqZwt/> (Accessed September 8, 2023.)

³ June 27, 2023 YouTube Video, at <https://www.youtube.com/watch?v=Vh6j4YHIxoE>, at 3:45-4:39, Courville speaking to/regarding Jevremović: “If you’re gonna sue, and this goes to anybody out there thinks they’re going to sue me for telling the truth, you better not have no skeletons in your damn closet. You better not have a single femur bone in your closet because I’m gonna find it. Oh yes I am. Stuff you never ever thought that I was gonna find I’m gonna find it and then if I find it and it was public which almost every single thing I ever find is public I’m gonna tell every damn person about it who will listen. Yes, I will. Do not sue me for telling the truth bitch! I bet you learned your lesson now! Didn’t you? So, long story short I’ve spent the greater part of the last two weeks probably 10 to 15 hours a day searching every single possible nook and cranny—not only of the internet but of the physical field of reality in order to find every single skeleton, every femur, every skull, every kneecap, every pinky toe bone...”

⁴ Courville has recently been working on projects with noted Q-Anon leader Liz Crokin, *See* <https://www.slaveprincess.com/credits> (Accessed August 31, 2023). Crokin has been described as “an early embracer of the QAnon conspiracy theory, which alleges the world is run by a shadowy cabal of Satan-worshipping pedophiles.”) <https://thehill.com/homenews/campaign/3765836-trump-hosts-mar-a-lago-event-with-prominent-qanon-pizzagate-conspiracy-theorist/> (Accessed September 6, 2023).

members—and released private materials such as Jevremović’s home address and social security number, her mother’s home address, and countless other private photographs and details to intimidate and terrify Jevremović, and to gain clicks and exposure for the “That Surprise Witness” brand.

Initially, one aspect of Courville’s campaign began in 2022 as a misguided attempt to “#FreeBam”, based on a misunderstanding that Brandon Margera (“Bam” as he is termed by fans, or hereinafter, “Margera”) was somehow being controlled or manipulated by Jevremović for her profit. It didn’t matter to Courville that Jevremović received no compensation whatsoever for her work in attempting to assist Margera in fighting his battle with addiction.

Back then, Margera’s family and friends were united in participating in his care—he was reconciling with his wife and spending time with his son. Positive influences in Margera’s life like Steven Glover (better known as Steve-O), Johnny Schillereff and Brandon Novak, who had successfully found sobriety, were helping him get his career back on track and visiting with him often. Unfortunately, when Courville’s early “#FreeBam” posts started gaining some online interest, unsavory characters slithered into Margera’s circle, including Vinny Beedle⁵ (“Beedle”) and Brian Pingor (“Pingor”) (an attorney who bragged about meeting Margera while they were both in rehab together). Beedle and Pingor befriended Margera at a fragile time and introduced him to Courville’s toxic #FreeBam movement—with no motivation but to keep Margera too intoxicated to notice they were maxing out his credit cards and selling stories about him to TMZ. They knew if Margera stayed sober, there would be no benefit to them, so they tilted Bam towards Courville’s toxicity and away from the friends and family who cared for him.

⁵ <https://twitter.com/VINNYBEEDLE> (Accessed September 5, 2023).

Yet, Courville has been untroubled by the fact that there was nothing to “#FreeBam” from, except court orders arising from Margera’s arrests that arose from the dangerous fight that Margera is having with addiction. Instead of grappling with the complicated realities of Margera’s fight with substance abuse, Courville elected to make Jevremović and AURA into straw man villains. Courville knew that Jevremović-as-villain would generate more views for her channel and followers, without regard for the effect her campaign against Jevremović would have on Margera.

Recently, as Courville’s off-kilter campaign has increasingly shifted towards a skewed personal vendetta against Jevremović, Margera has become an unfortunate casualty of Courville’s online firebombing of all things associated with Jevremović and AURA. Accordingly, Margera’s substance abuse issues have escalated and led to him being arrested twice in the past two months.⁶ Courville has been complicit in using Margera, abetting him in getting high and drunk before coming on her YouTube show, angling to get Margera to say negative things about Jevremović and AURA (to contradict the positive things that Margera had said about Jevremović while Margera was sober). Courville has shown complete disregard for whether her efforts could derail Margera from a year-long attempt at sobriety.

At the same time, Courville’s “#FreeBam” movement has been losing viewership and online followers, where it is becoming increasingly clear that the movement was nothing but a publicity ploy to drum up viewers and followers, that had nothing to do with the actual well-being of Margera or his family. Losing her grasp on viewership and followers on her social media channels, Courville has resorted to spiraling ever deeper into an unhinged obsession with

⁶ Margera was arrested on August 9, 2023, for charges relating to Public Drunkenness and Engaging in Fighting. See <https://www.nbcphiladelphia.com/news/local/jackass-star-bam-margera-arrest-radnor-hotel/3621538/#:~:text=Professional%20skateboarder%20and%20star%20of,to%20a%20law%20enforcement%20source> (Accessed September 6, 2023). Margera’s August arrest came just two weeks after an incident where he was charged with assault and making terroristic threats after a fight with Margera’s brother. (*Id.*)

destroying Jevremović. Courville’s panopticon of terror has reached into every conceivable cranny of Jevremović’s family and personal life, destroyed her business, and even driven her and her family from their homes.

At the same time, Courville has effectively frozen investment in AURA and forestalled further development of AURA’s new health-based business, even while simultaneously participating in the online health business “Giddy” as a contributor.⁷ As such, Courville’s conduct has the perverse effect that potential investors interested in a health start-up like AURA would perhaps now choose to invest in Giddy, rather than AURA.

Courville is nothing if not savvy about how to weaponize social media, and recent months have revealed a turn towards the depths of cyber-harassment and doxing in efforts to bring about real harm to Jevremović—an increasingly desperate attempt to keep her falling viewership and followers afloat at any cost, and to scare Jevremović into dropping this lawsuit.⁸

This includes publishing a video that urges Courville’s followers to “make some noise,” after arming her followers with Jevremović’s mother’s home address, phone number, and airing a humiliating mental health crisis video—a video that Oklahoma authorities have indicated should not have been available to the public.⁹ As a result of Courville’s doxing campaign, Jevremović’s mother lost her job as a Software Engineer, after thousands of people used the information released by Courville to dig into Jevremović’s mother’s personal life to harass her and make calls to her employers.¹⁰

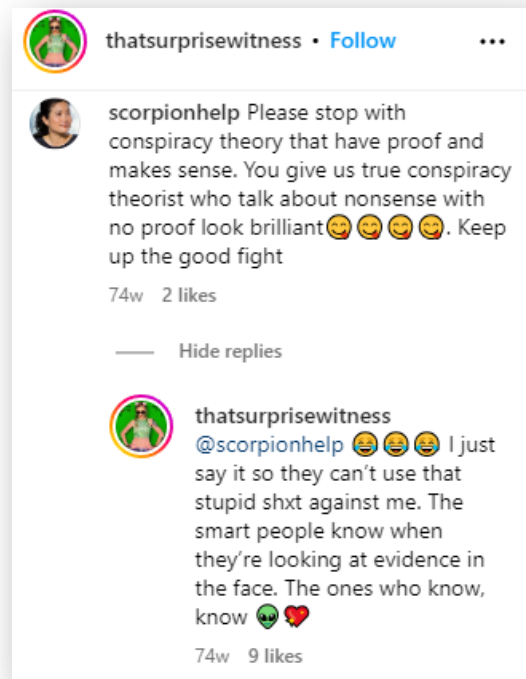
⁷ https://getmegiddy.com/BJ_Courville; https://getmegiddy.com/BARE/BJ_Courville (Accessed September 5, 2023).

⁸ June 27, 2023 YouTube Video: <https://www.youtube.com/watch?v=Vh6j4YHIxoE> (Accessed September 7, 2023).

⁹ <https://www.youtube.com/watch?v=CLiFEyC0WK8> (Accessed September 5, 2023). The Oklahoma police department from which this video footage was obtained has confirmed that this footage is not public information and Courville should not have been able to obtain it, and they have launched an on-going investigation into how Respondent was able to obtain these videos.

¹⁰ Although Courville’s release of private information is coupled with a disclaimer that such information should not be used to contact the people in the video, this disclaimer is disingenuous when combined with urgings that incite Courville’s followers to “make some noise” in tandem with the release of the private information. The same video insists that anyone could get the same bodycam footage that Courville released; however, when contacted to inquire how the HIPAA

All the while, Courville has pretended her statements are not to be taken seriously, all the while winking and signaling to her followers that she means every word. Indeed, Courville has revealed that she is deliberately labelling herself a “conspiracy theorist”, only so that her targets cannot use Courville’s false statements “against her”¹¹, as shown below:



On numerous occasions, Courville has confirmed that her false statements of fact are a wolf in sheep’s clothing (or a wolf in pink bunny ears)—hiding under a “conspiracy theorist” moniker as a shield to enable deeply dangerous false statements that are actually intended to be seen as true, and thus, are truly harmful.¹² Her followers tend to believe many of these Courville’s statements have extra weight because Courville has often touted her

protected video had been obtained, the police department confirmed that such video should not have been publicly available and has launched an investigation into the release of that footage.

¹¹ https://www.instagram.com/p/Cb5b59wFxIg/?img_index=1 (Accessed September 8, 2023.)

¹² Cf. Court’s August 10, 2023 Order on MTD, Jevremovic v. Courville, Dkt. 22-cv-4969 (ZNQ)(RLS) at 14 (August 10, 2023 (the “Order”).

background as a lawyer, and she has made numerous statements based on her “education, knowledge, and experience.”¹³ Importantly, many of Courville’s most serious false and misleading accusations about Jevremović have been made without any “panda ears or bunny ears” and without any props like the “sparkly unicorn pinata.”¹⁴ Instead, on her GoFundMe page, Courville describes herself as a “lawtuber and independent journalist” and has titled her fundraising campaign the “Facts Ain’t Defamation Fund”—which reveals that she releases false information as fact.¹⁵

Frighteningly, Defendants have demonstrated that the “That Surprise Witness” team knows no limits, including using fake pornography to create public humiliation and shaming, as when Defendants published a photograph/link¹⁶ falsely suggesting that Jevremović had an OnlyFans¹⁷ page—a profile page which links to pornographic films and photographs that are not Jevremović. As recently as August 8, 2023, Courville’s “@thatsurprisewitness” handle on Instagram hosted a post on a moderated comments thread that included Jevremović’s home address, which resulted in Jevremović’s needing to relocate and go into hiding for a third time since Courville’s campaign began.¹⁸ Drones were dispatched to Jevremović’s home and strangers began to appear near her front yard, lurking inexplicably, almost immediately after this information being released on Courville’s Instagram.¹⁹ At the same time, followers of Courville’s began calling themselves “that Surprise Army” and plotting to “make some noise”

¹³ May 4, 2022 Instagram Post, at <https://www.instagram.com/p/CdJDkylMVI/> (Accessed September 8, 2023.) (“To clarify, I am a licensed attorney...”)

¹⁴ See <https://www.youtube.com/watch?v=xdfvYfuEUaA> (Accessed September 8, 2023); see also <https://www.gofundme.com/f/facts-aint-defamation-fund> (“I am a lawtuber and independent journalist”); Cf. Court’s August 10, 2023 Order at 13 (“In satirical spirit, Defendant can be seen wearing either panda ears or bunny ears while making her statements, while a sparkly unicorn piñata rests prominently in the background.”)

¹⁵ <https://www.gofundme.com/f/facts-aint-defamation-fund> (Accessed September 9, 2023.)

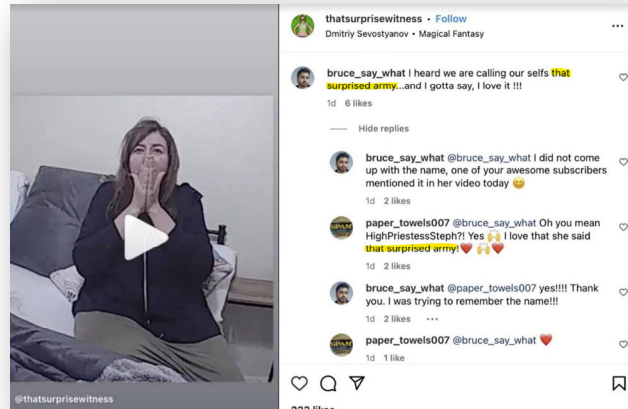
¹⁶ https://www.instagram.com/p/CciejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 9, 2023.)

¹⁷ <https://www.complex.com/life/a/joshua-espinoza/what-is-onlyfans-explainer> (Accessed September 9, 2023).

¹⁸ <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023).

¹⁹ <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023).

at Courville's urging, including on one of Courville's posts featuring non-public bodycam footage of Jevremović's mother and Jevremović's sister during a mental health emergency:²⁰



As Courville's increasing acceptance of new levels of dangerous online doxing and cyber-harassment has escalated, Jevremović has been left no choice but to seek a restraining order to protect her personal safety in California (*See* Exhibit 1, Temporary Restraining Order) and forced to bring the additional claims alleged herein to attempt to preserve Jevremović's business, and any last vestiges of her personal safety, and to preserve the hope of a normal life.

PARTIES

1. AURA is a limited liability company organized under the laws of Delaware, with its registered address and principal place of business located at 900 Winslow Way E Ste 300, Bainbridge Island, Washington 98110-2450, and with no member domiciled in New Jersey.²¹ AURA operates as a wellness supplements and healthcare solutions software business.

2. Jevremović, an individual, is the founder and CEO of AURA. She identifies her address as: c/o Neville Johnson, Johnson & Johnson, LLP, 439 North Canon Drive, Suite 200,

²⁰https://www.instagram.com/reel/Cvkr1pgM0x/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 6, 2023).

²¹ *See* Docket Nos. 28, 39.

Beverly Hills, California, 90210 because she and her family have received harassment and threats in connection with the claims in this matter, and because her home address was disseminated (and unknown third parties have attempted to gain entry while the family was home), Jevremović and her family relocated their residence multiple times and hired 24-hour security to guard their home. Jevremović thus respectfully seeks to avoid providing her California address in court filings, so she will not be forced to relocate yet again.

3. Defendant Brittany Courville is an individual who resides at 10 Teak Lane, Princeton, New Jersey, 08540, and operates the various “That Surprise Witness” social media channels, and formed the Entity Defendants.

4. Defendant Prem Benipal is an individual who resides at 10 Teak Lane, Princeton, New Jersey, 08540, and has financially supported Courville’s activities on her various “That Surprise Witness” social media channels—and has himself appeared on the “That Surprise Witness” podcasts with Defendant Courville, and is involved with the operations of the Entity Defendants.

5. Defendant “That Surprise Witness TV LLC” was formed in New Jersey, under file number 450708640, on September 30, 2021, to carry out the activities of Courville and Benipal on the various “That Surprise Witness” social media outlets.

JURISDICTION AND VENUE

6. Subject matter jurisdiction is appropriate to this Court under 28 U.S.C. § 1332 because complete diversity exists amongst the parties and the amount in controversy exceeds the jurisdictional minimum.

7. Venue is appropriate in this District under 28 U.S.C. § 1391(b)(1), (b)(2), and (c)(1) because Defendants reside in this District and published a substantial number of actionable statements to the Internet from this District.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

8. Defendant Courville is a New Jersey attorney, licensed in 2021 after graduating from The University of Pennsylvania School of Law in 2020. Courville worked at Winston Strawn briefly before she and the firm parted ways over Courville’s use of social media. On her LinkedIn profile, describes her profession as “Legal Commentary on YouTube/Social Media Law.”

9. At all relevant times, Defendant Benipal has provided financial support and acted as a *de facto* producer for various “That Surprise Witness” social media channels—and has himself appeared on the “That Surprise Witness” YouTube with Defendant Courville on numerous occasions and personally made false or misleading statements regarding Jevremović.²²

10. Both Individual Defendants have, on information in belief, acted in coordinated efforts to carry out the business of the Entity Defendant.

11. In July 2020, Courville began to affiliate herself with the “Free Britney” movement, which criticized the institution of a conservatorship on celebrity-musician Britney Spears. Courville uses variants of the handle “That Surprise Witness” on her various social media accounts. Courville reported becoming “obsessed” and using her newfound “legal expertise” to interpret the associated law, pleadings, and court opinions and orders. She spread this information online via videos, photos, and text commentary. As the “Free Britney” movement gained mass media attention, Courville was invited to give interviews as an attorney.

²² See <https://www.youtube.com/watch?v=5EPVSf8Kdlo> (Accessed September 7, 2023) (i.e., at 10:07 “Had [Jevremović] left Amanda alone, Amanda might be alive today...”.)

Courville gathered hundreds of followers and viewers during the time that she gave commentary in connection with the Britney Spears conservatorship.

12. However, after Britney Spears' conservatorship was terminated, Courville began to receive less attention, and fewer followers and viewers on her various "That Surprise Witness" social media handles. With her followers/viewers in the mere hundreds following the end of the Spears conservatorship, Courville needed to look for other celebrities and social media personalities that she could latch onto, to siphon off viewership and followers. Courville found the perfect combination of entities to tether "That Surprise Witness" to—with Margera (celebrity), Jevremović (entrepreneur with social media footprint), and AURA—Jevremović's wellness supplements and healthcare solutions software business that had been generating a lot of attention.

13. In 2019, Jevremović founded AURA to help individuals suffering through mental health crises, including addiction. AURA was founded to use technology to scale affordable, high-quality mental health treatment services. The Company was founded to support mental health professionals using the technology to track patient progress of people undergoing mental health treatment in various ways, *inter alia*, by recording and analyzing biometric data and providing the information to treatment providers from therapy sessions, connecting patients to therapists via telehealth, guiding users through grounding exercises and coping strategies, providing instructions in mindfulness and meditation, and using virtual reality (a.k.a. "VR") to, *e.g.*, assist with exposure therapy, a technique guided by licensed therapists to extinguish an anxiety response. The Company also produces vitamins/supplements for brain health and mood support and has explored various other means of using technology to enable better health outcomes.

14. AURA developed a community of adherents, and it has succeeded in garnering an initial round of investor funding for its development and launch. Through AURA, Jevremović supplied mental health assistance tools to numerous individuals free of charge in order to receive feedback, refine her tools, and develop a viral, word-of-mouth buzz surrounding the product. To that end, AURA had previously provided some services without charge to certain celebrities, influencers, and persons in the public eye—as well as individuals with no public presence as a community social service. Plaintiffs had been a successful and growing business in this regard, until Courville began to leverage the “That Surprise Witness” treatment against created Jevremović and AURA, concocting scandals from Courville’s new ersatz villains.

15. On September 20, 2021, Courville and Benipal formed “That Surprise Witness TV LLC” in New Jersey with file number 0450708640.²³

16. Courville and Benipal have co-hosted many of their broadcasts together and otherwise collaborate to carry out Courville’s individual actions in support of the Entity Defendant.²⁴

COURVILLE SPREADS FALSE STATEMENTS REGARDING DEATH OF AMANDA RABB

17. One such recipient of AURA’s free-of-charge services was Amanda Rabb (“Rabb”), an unhoused, drug-addicted woman residing in Los Angeles’ notorious Skid Row who turned to sex work to fund her addiction. AURA provided \$250,000 to be used by Rabb for a year of mental health treatment (including detoxification), seven months of in-patient residential care, three months of full-time out-patient treatment while residing at a sober living facility, and

²³ <https://www.njportal.com/DOR/BusinessNameSearch/Search/EntityId> (Accessed September 5, 2023).

²⁴ See https://www.instagram.com/p/CvhzNuqAV67/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 6, 2023).

two months of job placement training and reduced therapy to gradually integrate Rabb back into society as a productive, healthy member. Rabb was also given the option to use AURA's products at no cost in conjunction with her treatment and therapy under the supervision of health care professionals. Jevremović personally funded the majority of Rabb's treatment, including drawing \$212,500 from a personal line of credit, supplemented by \$37,241 in donated funds.

18. Tragically, on Sunday, May 9, 2021, staff at the Desert Hope Treatment Center ("Desert Hope"), where Rabb was receiving treatment—a treatment center not in any way controlled or operated by AURA or Jevremović—found Rabb unresponsive in her bed and unsuccessfully performed CPR. When an AURA employee contacted the Clark County Coroner's Office, requesting information regarding Rabb's death, Desert Hope relayed to AURA and Jevremović that Rabb only had Tylenol in her system—a fact that was verified by a representative of the Clark County Coroner, Dr. Paul Uribe. Dr. Uribe added that Rabb's death resulted from natural causes, likely from multiple causes including physical trauma previously endured while abusing illicit substances and harm caused directly by the substances she had formerly abused. Rabb's formal autopsy report states that she died from cardiac arrhythmia with hypertension, obesity, and schizophrenia as contributing factors. Courville conveniently left out that Jevremović made two separate podcast appearances, on Soft White Underbelly [published on Sep 9, 2022] and No Jumper [published on Sep 28, 2022], to clarify that the information Jevremović was based on conflicting information received from Dr. Uribe.

19. It is not a coincidence that Courville launched her campaign of lies and misinformation surrounding the Rabb tragedy, around the time that Jevremović became involved as a court-appointed guardian to seek to help Margera in his fight with addiction. Some of Margera's unsavory associates such as Beedle and Pingor egged on Courville's efforts as a vigilante muckraker. These associates did not want to see Margera get better—these desultory

individuals wanted to continue to take advantage of him financially and to borrow on Margera's fame—and they urged Courville to amplify her false claims to further these ends.

20. So it was that Courville's thirst for online stardom was wedded with a deliberate effort to destroy Jevremović and AURA. Courville's campaign against Jevremović and AURA was amplified at the urgings of Beedle and Pingor, who sought to wild Courville's influence to punish Jevremović for trying to help Margera in his battle with the demons of addiction.

21. Defendants' blitz of false statements regarding Jevremović and AURA, analyzed in detail below, began in February 2022 and has continued through September 2023, a modern media manipulation that has been pervasively toxic and wide ranging. While Defendants' social media blackmail effort began impugning with Jevremović and AURA making false suggestions that Jevremović had played some part in Rabb's cause of death, the media offensive has expanded to accusing of Jevremović of numerous additional humiliating falsehoods. See Count I, *infra*. Working Defendants' social media adherents into a dangerous frenzy, with Courville's adherents now labelling themselves "That Surprise Army", the crusade has escalated to dangerous cyber-harassment and doxing to intimidate Jevremović into dropping this lawsuit and gain clicks with fear mongering, which has increasingly crossed over from online commentary into real world effects that have caused a well-founded fear in Jevremović and her family for their personal safety.²⁵

²⁵ See, e.g., *Hate Speech on Social Media: Global Comparisons*, COUNCIL FOR FOREIGN RELATIONS, at <https://www.cfr.org/background/hate-speech-social-media-global-comparisons> ("Users' experiences online are mediated by algorithms designed to maximize their engagement, which often inadvertently promote extreme content. Some web watchdog groups say YouTube's autoplay function, in which the player, at the end of one video, tees up a related one, can be especially pernicious. The algorithm drives people to videos that promote conspiracy theories or are otherwise 'divisive, misleading or false,' according to a Wall Street Journal investigative report. 'YouTube may be one of the most powerful radicalizing instruments of the 21st century,' writes sociologist Zeynep Tufekci.") (Accessed September 1, 2023.)

22. All the while, Defendants have callously profited from this behavior in the form of advertising revenues.

**COURVILLE SPREADS FALSE STATEMENTS REGARDING
JEVREMOVIĆ'S INVOLVEMENT WITH BAM MARGERA**

23. Celebrity entertainer Margera and his wife, Nicole Boyd-Margera (“Boyd-Margera”), took an interest in AURA in the Winter 2020. Margera has starred in blockbuster Jackass movies and popular television programs. Margera fought a longtime battle with substance abuse and witnessed numerous members of his inner-circle fight addictions over the previous two decades. Because of his background, Margera and Boyd-Margera initially sought to provide their support to Plaintiffs’ efforts to mediate addiction and improve related health outcomes. However, when Margera proved susceptible to multiple relapses in his battle with addiction, Margera’s family approached Jevremović for intervention assistance.

24. On or about June 7, 2021, an Arizona court imposed a one-year temporary guardianship over Margera in connection with his diagnosed medical issues. When Margera’s family and friends implored Jevremović to serve as Margera’s temporary guardian, Jevremović agreed and took on the responsibility for overseeing Margera’s treatment, which was put into effect by Court Order, with no connection to his financials or other aspects of his life. Indeed, despite the fact that the Jevremović was statutorily permitted to collect reasonable sums for her services as guardian, Jevremović has received no compensation whatsoever, directly or indirectly, as Margera’s guardian. Rather, Margera’s father has been assisting Margera in managing his finances for many years at Margera’s request, and Jevremović’s appointment as a temporary guardianship never touched upon Margera’s money in any way.

25. After the court-ordered guardianship terminated, Margera requested that Jevremović continue to serve as his “Health Care Agent,” a role in which she assists Margera with his medical care related to his mental health treatment and recovery.

26. After learning that Jevremović was involved in Margera’s recovery, Courville began publishing videos, photos, and text commentary regarding Margera, labeling her publications “#FreeBam,” a reference to Margera’s stage name, “Bam.”

27. Courville began with baseless assertions that Margera’s family and Jevremović manipulated a court-imposed guardianship as a tool to access Margera’s assets, and that Jevremović is committing and assisting in the commission of criminal acts and that Jevremović is dishonest and promulgates lies.

28. At the same time, on a parallel front of Defendants’ concerted media campaign, Courville manipulated the background of facts surrounding the Rabb tragedy, and published videos, photos, and textual commentary in which she falsely accused Jevremović of criminal acts and dishonesty.

29. Defendants’ statements become so prolific that they all but wiped any legitimate results regarding Jevremović and AURA from the first few pages of Google search results regarding either Plaintiff. Defendants directly disrupted AURA’s second round funding, causing potential investors actively involved in funding discussions to retreat.

30. Courville’s false and misleading statements about Plaintiffs have directly interfered with AURA’s business and caused deep financial disruption to Jevremović, directly resulting in order cancellations and the withdrawal of marketing affiliates.

ACTUAL MALICE

31. Courville knew and ignored the fact that no evidence demonstrated Jevremović to be dishonest and knew and ignored the fact that no evidence demonstrated Jevremović to be a criminal, because her true motivations were to create a smear campaign that would increase views, divert Jevremović from effectively acting as guardian to Margera, ruin Jevremović's business, and eventually seek revenge on Jevremović for filing this lawsuit.

32. At least at the outset, Courville had a preconceived story line, *i.e.*, that Jevremović must be acting improperly, and Courville purposefully twisted and misrepresented information in whatever manner would accomplish her purpose of dissuading Jevremović from acting as a guardian for Margera.

33. That purpose changed over time to a more generalized goal of destroying Jevremović and AURA at any cost, out of an obsessive interest in Jevremović that developed over the course of the conduct.

34. Defendants also purposefully sought to reap the benefits that disinformation and online harassment have in the form of increased viewership and followers for Defendants' social media channels.

35. Courville was aware that her statements of fact were untrue based on their inherent improbability—such as outlandish and unfounded assertions that Jevremović is involved in human trafficking.

36. Courville took steps to deliberately avoid learning the truth regarding Jevremović despite the fact that such information was available to her. For instance, in her most viral video titled "Virtual Reality Hell", Courville asserts that Rabb's father was a molester eight times and

suggests that Jevremovic was working with a molester to coordinate Rabb's treatment²⁶, while at the same time, aware that Rabb had come out to clear her father's name before her tragic death.

37. Courville specifically posted that her intent in pursuing AURA was specifically "trying to stop [AURA] before it even gets off the ground."²⁷

38. Defendants' videos air advertisements from which they personally profit. Thus, Defendants are incentivized to publish and disseminate shocking and untrue materials²⁸, materials regarding celebrities, and other materials designed to maximize the views received by the commercials that play during their videos.

39. Courville further solicits and collects donations directly from viewers during her live broadcasts *via* YouTube, and Courville operates a site to solicit donations on gofundme.com that has generated \$48,108 in donations thus far.²⁹ Courville has a Patreon account³⁰ (an organization that provides users tools with which to fundraise) where she has generated paying subscribers, and where Courville solicits additional funds for in-depth "investigations" and videos in furtherance of her campaign. Defendants promote branded "That Surprise Witness TV" merchandise, deriving income from their activities.³¹ Defendants derive income via false, misleading and defamatory statements, that also serve to generate more buzz and more viewers.

40. On July 15, 2022, Plaintiffs contacted Courville in writing to demand retraction of defamatory statements. To the extent Courville disclaimed any of her defamation, her

²⁶ https://www.youtube.com/watch?v=xdfvYfuEUa&list=PLO9hzkqACQ1yoJ_RPLakmoyil7pb84_Uq&index=2.

²⁷ @That Surprise Witness, Instagram video, at time stamp 7:23 <https://www.instagram.com/p/Ca2DuTfqZwt/> (Accessed September 8, 2023.)

²⁸ <https://news.mit.edu/2018/study-twitter-false-news-travels-faster-true-stories-0308> (Accessed September 1, 2023) ("[F]alsehood diffuses significantly farther, faster, deeper, and more broadly than the truth, in all categories of information, and in many cases by an order of magnitude.")

²⁹ <https://www.gofundme.com/f/facts-aint-defamation-fund> ("Facts Aint Defamation Fund").

³⁰ <https://www.patreon.com/thatsurprisewitness/posts> (Accessed August 20, 2023.)

³¹ <https://thatsurprisewitness.com/products/facts-aint-defamation-black-hoodie> (Accessed September 1, 2023.)

attempts were patently pretextual and obviously insincere. On July 22, 2022, Plaintiffs again contacted Courville in writing to identify further defamatory statements and to demand their retraction. No retraction issued and instead, Courville issued retaliatory false claims that suggested Margera was an investor in AURA³²—which has never been true.

41. Courville and Benipal's doxing and harassment goes far beyond any sort of alleged social commentary, and on information and belief, is instead motivated by a desire to bring down Jevremović at any cost, even if it means exposing Jevremović to physical harm.

42. This conduct has forced Jevremović to file police reports in New Jersey, California, and Oklahoma—and the LAPD Threat Management Unit is currently investigating Courville's actions as potentially criminal instances of stalking.

43. Jevremović was forced to apply for a Restraining Order in California based on the actions of Courville's followers after they were armed with Jevremović's address, and as a result, Courville is subject to a Preliminary Restraining Order (attached as Exhibit 1), which includes an Order to Cease further social media posting about the protected parties (Jevremović, her sister and Jevremović's husband) with a hearing scheduled for September 25, 2023 to determine if a permanent restraining order will issue on the basis of Courville's malevolent conduct.

**WITH INTEREST IN DEFENDANTS' SOCIAL MEDIA CHANNELS WANING,
COURVILLE HAS TURNED TO INCREASINGLY EXTREME ONLINE
BEHAVIOR TO MAINTAIN VIEWERSHIP AND FOLLOWERS**

³² <https://www.youtube.com/watch?v=JbM360M98Ew&t=3s> (Accessed September 8, 2023.) (at Time Stamp 36:45-37:06: "Question whether that is ethical or appropriate for someone [Margera] who is basically an investor in your business [AURA] and now you put them under a conservatorship like I don't know about the actual laws behind that but that doesn't seem appropriate that you could be the someone's guardian or conservator and they have purchased a stake in your business".) Margera has never been an investor in AURA.

44. Additionally, it would seem that Defendants have resorted to an unabashed campaign of doxing and cyber-harassment in attempts to intimidate Jevremović and prevent Jevremović from maintaining this lawsuit, which was a goal stated by Courville in a YouTube video.³³

45. Courville's intent to seek to get Jevremović to drop this lawsuit has been a pervasive theme in the past year with Courville doxing even Jevremović's attorney, providing Neville L. Johnson's image in connection with her video criticizing the lawsuit³⁴:



46. Courville's unlawful activities have further evolved into a personal obsession with Plaintiff, and continuously increasingly disturbing incidents of harassment and doxing.

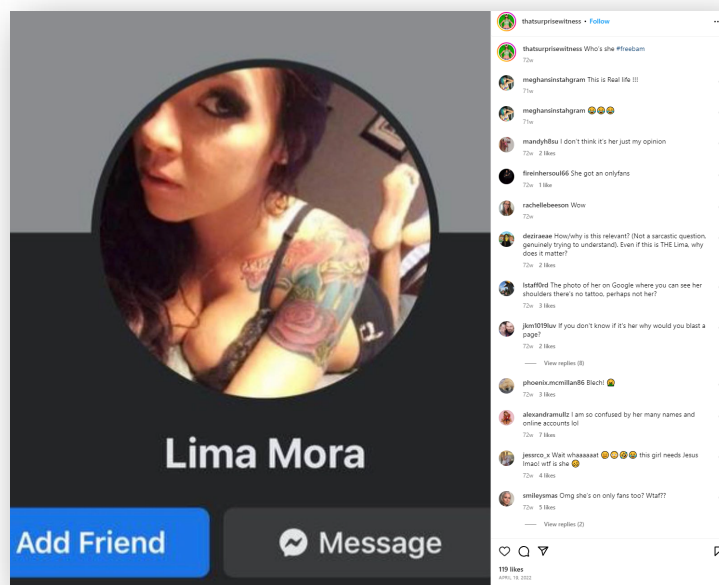
47. Over the course of nineteen months of harassment, the Defendants have caused to be published over 300 videos across various forms of social media that are about Jevremović, with a total of 2,802+ minutes (46.7 hours), 8,000,000+ views across YouTube, Rumble, Instagram, Twitter and TikTok, and with over 1000 posts to Instagram and Tiktok about

³³ June 27, 2023 YouTube Video, at <https://www.youtube.com/watch?v=Vh6j4YHlxoE>, at 3:45-4:39 (Accessed September 8, 2023.)

³⁴ <https://www.youtube.com/watch?v=JbM360M98Ew&t=3s> (Accessed September 8, 2023.)

Jevremović. This does not include hundreds of other posts on Instagram and other forms of social media.

48. In one especially humiliating post on April 22, 2022, Defendants caused to be published a photograph³⁵ on the @ThatSurpriseWitness Instagram handle, falsely communicating that Courville had found an OnlyFans³⁶ page for Jevremović—a profile page which links to pornographic films and photographs that are not Jevremović, as pictured below:



³⁵ https://www.instagram.com/p/CciejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 9, 2023.)

³⁶ <https://www.complex.com/life/a/joshua-espinoza/what-is-onlyfans-explainer> (Accessed September 9, 2023).

49. Courville has amplified the harm³⁷ to Jevremović from her campaign by including the false allegation regarding Jevremović's involvement in pornography, without any conceivable legitimate purpose except to harass and cause harm to Jevremović's reputation.³⁸

50. Courville has at various times published to the Internet Jevremović's social security number, date of birth, unlisted home phone number, and three of Jevremović's unlisted home addresses³⁹, her family members' addresses, among many other pieces of highly personal and sensitive information in a coordinated and intentional doxing campaign.

51. Additionally, Defendants' publication of Jevremović's sisters addresses, resulted in the kidnapping and rape of Jevremović's sister, Dahlia, soon after the publication of Dahlia's otherwise private address.

52. After being besieged in their home in Washington state by Courville's devotees, where Courville encouraged followers to "make some noise" directed towards Jevremović, Jevremović and her family relocated to California for their safety and have hired a round-the-clock home security detail.

53. As recently as August 2023, Defendants' "@thatsurprisewitness" handle on Instagram included a post with comments that included Jevremović's home address (in Courville's moderated comments section), which has resulted in Jevremović's needing to relocate and go into hiding, as drones were dispatched to her home and strangers began to appear

³⁷ Mary Anne Franks, *Unwilling Avatars: Idealism and Discrimination in Cyberspace*, 20 Colum. J. Gender & L. 224, 255 (2011) ("[W]omen's unwilling online embodiment is in effect a double-embodiment is one of the reasons that cyberspace harassment of women should be taken seriously. Women are frequently objectified in real life in ways that negatively impact their health, careers and general well-being, and are then re-objectified online in ways that also negatively impact their health, careers and general well-being. In the offline world, women are disproportionately "bodied"-over-identified with their physical characteristics-through their physical vulnerability relative to men and their historical, legal, and social objectification."); <https://www.pewresearch.org/internet/2021/01/13/the-state-of-online-harassment/> ("Women targeted in online harassment are more than twice as likely as men to say most recent incident was very or extremely upsetting.")

³⁹ See, e.g., <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023).

near her front yard, lurking inexplicably, almost immediately upon this information being released on Defendants’ “@thatsurprisewitness” Instagram handle:⁴⁰



54. Followers of Courville’s began calling themselves “that Surprise Army” and plotting to “make some noise” at Courville’s urging, including on one of Courville’s posts featuring private bodycam footage of Jevremović’s mother and Jevremović’s sister.⁴¹

55. After years of Defendants’ assault on Jevremović, many previous collaborators of Jevremović’s have fallen away. For example, Jevremović used to collaborate with Chloe Wilkinson on video projects relating to Wilkinson’s “DissociaDID” social media channel and supported each other through difficult times, communicating through WhatsApp, for many years, until in August 2022, after Wilkinson became aware of Defendants’ content regarding Jevremović, Wilkinson publicly denounced, ceased all future collaborations with Jevremović

⁴⁰ <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023) (the post has since been edited to remove the comment that included Lima’s home address, but the screenshot above includes the post as originally listed).

⁴¹ https://www.instagram.com/reel/Cvkr1pgM0x/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 6, 2023).

and blocked Jevremović on whatsapp based on Defendants’ content. This caused Jevremović to lose a valuable friendship, and to lose further followers and viewers on her own social media channels, as a result of losing this valuable cross platform collaboration.

56. Likewise, Courville’s obsessive harassment and doxing has placed Jevremović in a false light, suggesting in turn that Jevremović is, by turns, a human trafficker⁴², the cause of Amanda Rabb’s death⁴³, a plotter out for Margera’s money, a pornographic actress, and myriad other mistruths.

57. Her followers tend to believe many of these items⁴⁴ especially because of Courville’s background as a lawyer, where she has made numerous statements based on her “education, knowledge, and experience.”⁴⁵ Indeed, many of Courville’s most serious false accusations have been made without any “panda ears or bunny ears” and without any props like the “sparkly unicorn pinata.”⁴⁶

58. After nearly two years of Defendants’ hundreds of postings about Jevremović and AURA, the top search engine results for Jevremović and AURA are now almost all Defendants’ false and/or intimidating social media content.

59. At the same time, Defendants’ videos regarding Jevremović make up more than half of Courville’s top ten most viewed videos, from which it can be inferred that Courville has

⁴² https://www.instagram.com/p/CcizM8YlOrq/?img_index=1 (Accessed September 8, 2023.)

⁴³ May 30, 2022 Instagram Post, at https://www.instagram.com/p/CeMD_1Auo7L/?img_index=1 (Accessed September 8, 2023) (falsely suggesting Jevremovich’s “Last ward died in her care and she lied about the cause of death.”)

⁴⁴ <https://www.socialmediatoday.com/news/new-report-shows-that-facebook-and-youtube-lead-the-way-as-key-sources-of-n/606877/> (Accessed September 8, 2023.)

⁴⁵ May 4, 2022 Instagram Post, at https://www.instagram.com/p/CdJDkylMVl_/ (Accessed September 8, 2023.) (“To clarify, I am a licensed attorney...”)

⁴⁶ See <https://www.youtube.com/watch?v=xdfvYfuEUaA> (Accessed September 8, 2023); see also <https://www.gofundme.com/f/facts-aint-defamation-fund> (“I am a lawtuber and independent journalist”); Cf. Court’s August 10, 2023 Order at 13 (“In satirical spirit, Defendant can be seen wearing either panda ears or bunny ears while making her statements, while a sparkly unicorn piñata rests prominently in the background.”)

operated with the awareness of the economic potential from distributing falsehoods about Jevremović.

60. Accordingly, Defendants' activities have destroyed AURA's abilities to operate professionally or commercially and caused massive financial harm to both Plaintiffs.

61. As a result of the foregoing activities alleged regarding Defendants, AURA has lost countless investors and revenues have declined to near null.

62. Defendants' activities have caused substantial and irreversible damage to Jevremović's career and reputation, and her career as an entrepreneur and healthcare activist has been nearly destroyed.

63. Defendants' activities have destroyed Jevremović's prior income from social media, which was substantial prior to Courville's siphoning off Jevremović's followers/viewers by way of the unlawful activities.

FIRST COUNT

LIBEL

(By Plaintiff Lima Jevremović against All Defendants)

64. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 63 as though fully set forth in this paragraph.

65. On May 30, 2022, Courville published via Instagram the statement⁴⁷:

Lima [Jevremović]. . . LIED ABOUT [AMANDA'S] CAUSE OF DEATH TO MILLIONS of people.

66. This statement is defamatory as it expressly impugns Jevremović's honesty and is wholly false.

⁴⁷ https://www.instagram.com/p/CeMD_lAo7L/?img_index=1 (Accessed August 28, 2023.)

67. In this same statement, published alongside photos and videos of Jevremović at Disneyland with Bam Margera and his family, Courville refers to Jevremović as a “handler[] and trafficker[].”

68. This statement is defamatory as it characterizes Jevremović as a trafficker, and thus a criminal, which she is not.

69. On April 19, 2022, Courville published an image⁴⁸ of Jevremović reading Amanda’s cause of death (as per the information obtained by an AURA employee from the Clark County Coroner) from a YouTube video to Instagram with the caption:

I requested the autopsy report and lima is lying in this video. There was NO evidence of traumatic injury. There was LOTS [sic] of medication in her system (not ‘only Tylenol’). The cause of death has nothing to do with ‘seizure disorder’, but rather cardiac arrhythmia. I’ve posted on [Instagram]about it.

70. This is defamatory insofar as it falsely accuses Jevremović of dishonesty, whereas Jevremović in fact accurately conveyed the information that the Clark County Coroner had conveyed to AURA.

71. On April 19, 2022, Courville published photos⁴⁹ of Amanda Rabb’s “Report of Investigation” record obtained from the Clark County Coroner, and Courville published comments stating:

Two of Lima’s lies EXPOSED: (EXCLUSIVE AUTOPSY REPORT) 1. WAYY [sic] more than just Tylenol in her system (including cannabinoids [sic] and barbiturates) 2. Cause of death is NOT ‘seizure disorder’ or ‘caused by beatings and rap[e]s’ [sic], but rather, ‘cardiac arrhythmia’. #AmandaRabb #FreeBam #LIARS.

72. These false statements are defamatory insofar as they impugn Jevremović’s honesty.

⁴⁸ <https://www.instagram.com/p/CciSZGpOyPH/> (Accessed August 30, 2023.)

⁴⁹ https://www.instagram.com/p/CciRdYbuxUX/?img_index=1 (Accessed August 30, 2023.)

73. On April 19, 2022, Courville published a video⁵⁰ of Jevremović reading Amanda’s cause of death (as per the information obtained from the Clark County Coroner) from a YouTube video to Instagram. Courville commented on the video, stating:

So lima from @meetAURA BOLD FACE LIED to [Mr. Laita] and [YouTube] followers when she said Amanda Rabb’s cause of death was ‘seizure disorder’. I have reached out twice to [Mr. Laita] for comment, and he has ignored me. Why did lima lie?? #FreeBam #AmandaRabb.

74. This false statement is defamatory insofar as it impugns Jevremović’s honesty.

75. On April 3, 2022, Courville published an image⁵¹ on Instagram which purports to list biographical information about Margera, including his putative net worth (\$20 Million). Courville commented on the image:

According to @distractify, [Margera] is worth \$20 million. Now who would have an incentive to want to control that money and who would be in a position to do so 🤪 🤪 🤪 but what do I know I’m just a cOnSpIraCy tHeOrIsT 🤪 🤪 🤪 🤪 #FreeBam.

Another commenter states:

20 million now, soon to be much less, but it’ll all be ‘legit,’

to which Courville responds:

but a certain someone will have fresh lips, Botox, and a BBL watch.

Based on her other comments using the term “#FreeBam,” her audience would reasonably interpret Courville’s comments here to reference Jevremović – in fact, people did comment in response who understood the messages to reference Jevremović.

76. These statements are defamatory insofar as Courville falsely characterizes Jevremović as depleting Margera’s money rather than assisting with treatment for a substance

⁵⁰ <https://www.instagram.com/p/CciQwHOO-Ux/> (Accessed August 30, 2023.)

⁵¹ <https://www.instagram.com/p/Cb5b59wFxIg/> (Accessed August 30, 2023.)

abuse disorder. Such statements are defamatory as they falsely impute a motive to Jevremović, which most people would find condemnable.

77. On March 30, 2022, Courville published to Instagram an excerpt of a YouTube video⁵² in which Jevremović and Larry Rabb, Amanda Rabb's father, describe how they managed to transfer Amanda from jail to a drug rehabilitation facility through the use of Court Ordered Treatment under California law. Pausing and speaking over the video at the one-minute and fifteen-second timestamp, Courville states that Amanda's public defender is not supposed to:

help you push your scam conservatorship through.

78. This statement is defamatory per se insofar as it accuses Jevremović of a scam with reference to attempting to impose an LPS conservatorship on Rabb; this imputes criminality or at least immorality and is thus defamatory.

79. On May 7, 2022, Courville published a photo⁵³ to Instagram picturing Margera's costars from his television show and movies performing a stunt, and Courville captioned the photo:

[PEOPLE] . . . are mad that I'm uncovering a criminal conspiracy

And

#FREEBAM.

She further published a comment on the photo stating,

Let the #conspiracytheories roll #freebam.

⁵² <https://www.instagram.com/p/CbvTro1JLYk/>

⁵³ <https://www.instagram.com/p/CdQOLU9OQxl/>

80. These statements were defamatory as they falsely imply that Jevremović, as a person Courville repeatedly identifies as responsible for Margera's confinement, is a criminal and engaged in a criminal conspiracy.

81. On May 6, 2022, Courville published a picture⁵⁴ of Margera to Instagram, overlaid with an anonymous person's statement criticizing Courville's publications:

the whole #freebam thing is so weird and i [sic] strongly believe that [Courville] is a conspiracy theorist. if [sic] she was an actual lawyer[,] wouldn't she actually be busy? sorry [sic] i'm [sic] not buying it

Courville published a comment in response:

I AM a conspiracy theorist. I have a theory that this is a criminal conspiracy. So they're right! #freebam.

82. This statement is defamatory as it implies that Jevremović is engaged in a criminal conspiracy with respect to her previous involvement with Margera—which is false and misleading, and has caused harm to Jevremović.

83. On May 4, 2022, Courville published an image⁵⁵ to Instagram containing mostly text; the text is a republication of a comment previously made by Courville, which of relevance includes:

. . . I am a licensed attorney who believes [Margera]'s constitutional rights have been violated. Based on my education, knowledge, and experience, he has been set up by a group of criminal co-conspirators for financial purposes not in [Margera's] best interest. . . . #freebam SPREAD THE WORD.

84. This statement constitutes defamation insofar as it implies that Jevremović, as a person whom Courville repeatedly identifies as central in Margera's treatment, is engaged in a criminal conspiracy and is attempting to co-opt Margera's assets. Further, Courville encourages her audience to further publish her statements.

⁵⁴ <https://www.instagram.com/p/CdOTKc4OFcG/>

⁵⁵ <https://www.instagram.com/p/CdJHr4Yu7Wl/>

85. On May 4, 2022, Courville published an image⁵⁶ on Instagram regarding Margera, and a user, “pettyhearst,” commented thereupon stating:

I’ve been a [Margera] fan for 20 years, and his parents are good people who want the best for their son. While I personally believe conservatorships are never the answer and forced treatment is harmful, if it was just them in charge[,] I would at least have peace of mind that there is no malicious intent. But they aren’t in charge[;] Lima is, and she’s a snake oil salesman with blood on her hands. She’s clearly adept at manipulation, and I have no doubt she is manipulating [Margera’s parents].

86. Courville published a reply directly to this statement expressing agreement:

bingo.

87. This statement is defamatory insofar as Courville affirmed the false statements made by the anonymous commenter, thus adopting those comments as her own. These statements assert that Jevremović is manipulating persons for her own gain (impugning Jevremović’s honesty) and imply that Jevremović is not acting in Margera’s interest, that Jevremović is responsible for Rabb’s death (“blood on her hands” – in conjunction with Courville’s other defamatory statements with respect to Jevremović and Rabb, this is a reference to Jevremović allegedly being at fault for Rabb’s death), and that Jevremović has malicious intent.

88. On April 27, 2022, Courville published on Instagram an image⁵⁷ showing a digital message sent to her in which Courville is criticized for spreading falsehoods (i.e., “Irresponsible videos with imagined facts can be very damaging to others”). Courville captioned the image:

SUE ME

and published a comment on the image, stating:

The only facts that were imagined came from Lima Jevremović’s lying ass mouth.

⁵⁶ <https://www.instagram.com/p/CdJDkylMVL/>

⁵⁷ <https://www.instagram.com/p/Cc3Ch4YLTyb/>

89. This false statement is defamatory insofar as it impugns Jevremović's honesty.

Courville further published a comment to this image, stating:

if telling the truth is 'damaging to others' and those others are criminals, SO BE IT.

90. This statement is defamatory insofar as it implies that "others" is Jevremović and thus falsely implies that she is a criminal (the "others" referenced is clearly a reference to Jevremović, in context).

91. On April 27, 2022, Courville published on Instagram another image⁵⁸ showing a portion of the message sent to her. Courville published a comment associated with the image that reads in relevant part:

Or is it maybe because the public record doesn't agree with the fake[,] imaginary tale surrounding Rabb's death that [the message sender] wants us to believe??.

92. This statement is defamatory as it impugns Jevremović's honesty by implying that she fabricated a "fake[,] imaginary tale" to mislead people. In a separate comment, Courville further answers a question about Jevremović's description of HIPAA's application to Rabb, stating:

because they lie.

93. This is defamatory as it is false and expressly impugns Jevremović's honesty.

94. On April 26, 2022, Courville published to Instagram a screenshot⁵⁹ showing the "gofundme" donation page for Rabb's treatment, which then indicated that no new donations would be accepted. Courville commented on this photo with the statement:

Thanks for taking down your fraudulent fundraiser lima!

⁵⁸ <https://www.instagram.com/p/Cc21n0Isp74/>

⁵⁹ <https://www.instagram.com/p/Cc1UinJsWvQ/>

95. This statement is defamatory as it falsely imputes criminality to Jevremović, expressly accusing her of fraud.

96. On April 25, 2022, Courville published on Instagram an excerpt⁶⁰ from a Complaint previously filed by Margera against others affiliated with his television and film career. A commenter stated in response:

You discover so much more each days [sic] that goes by.. I don't trust any of them.. If this man does not come out of this [conservatorship,] they will eventually [k]ill him with prescription drug[s] or disguise street drugs as prescription drugs[;] who knows.. If [Britney Spears] would not be out of this[,] she would prob[ably] be de[a]d by now.. This man need[s] to be saved and free now.. #freebam.

In response, Courville states:

the plan is to end his life. I'm convinced of it. #savebam.

97. This statement is defamatory insofar as it alleges that those involved in “the plan” are seeking to kill Margera; in context with Courville’s statements regarding Jevremović being central to Margera’s treatment, one can reasonably infer that Courville is falsely referencing Jevremović as planning to kill Margera.

98. On April 25, 2022, Courville published to Instagram a screenshot⁶¹ showing that the “Donate now” button was still present on the “gofundme” donation page for Rabb’s treatment. Courville commented, asking Gofundme:

can you return the funds that have been fraudulently collected from donors on this fundraiser?

and stated,

many people have reported this fraudulent fundraiser and your organization has taken no action.

⁶⁰ <https://www.instagram.com/p/CcxsX9HsR9H/>

⁶¹ <https://www.instagram.com/p/CcxeH1hOK1d/>

Elsewhere, Courville states that

we've reported [fraud] a lot

99. These statements are defamatory as they falsely accuse Jevremović of criminal behavior – namely, fraud.

100. On April 19, 2022, Courville posted an image⁶² comprising text with the tip line for human trafficking from the National Human Trafficking Hotline, and Courville commented: “#FreeBam.” Courville specifically highlighted the phone number and the text stating,

REPORT A TIP with information on potential human trafficking activity.

101. Courville further added a second photo, depicting a cell phone call to a phone number with five minutes having elapsed, the implication being that Courville had called to report Margera as being trafficked to the National Human Trafficking Hotline. A commenter asks in response:

There [are two] different numbers?!

to which Courville answers:

yeah[,] there's a few[,] I called a different tip line[,] but you can call either one.

102. This is defamatory because Courville implies that Margera is being trafficked, a criminal act, and in the context of her other statements used in connection with the “#FreeBam” tag, it is clear that she views Jevremović as central to this effort. In the context of her statement that she has called to report Margera's situation as human trafficking and in light of her explicit instructions to a commenter to call, Courville intends this statement to be understood sincerely.

103. On April 19, 2022, Courville published an image⁶³ on Instagram containing a short conversation between Courville and a commenter. The commenter accurately stated:

⁶² <https://www.instagram.com/p/CcizM8YlOrq/>

⁶³ <https://www.instagram.com/p/CcibN0JOx89/> (Accessed September 8, 2023.)

[Margera is] not under a conservatorship[;] he’s under a guardianship – big difference.

104. As recounted in the discussion of Margera above, he was subject to a guardianship imposed in Arizona, and at no relevant time has a conservatorship been imposed. Nonetheless, Courville invokes her credentials, suggests she holds expertise, again provides an inaccurate interpretation of the law, and solicits viewers for her advertisement-supported videos:

are you a lawyer? Because I am. It’s not different. It’s exactly the same. Different states just call it different things. Please feel free to check out my Bam Margera playlist on YouTube for more info!

In response, a commenter remarked:

Every state is so different that I think these people use it to confuse people. I wonder if it would help if it was more uniform across the United States?

Courville, apparently drawing upon her self-avowed lawyerly expertise, explains:

it’s to confuse people so the criminals can keep crim[e-]ing.

105. This is defamatory insofar as, in the context of discussing Margera, it falsely states effectively that the guardianship system is a criminal tool, and thus by implication that Jevremović, as Margera’s guardian, must be a criminal.

106. On April 19, 2022, Courville published on Instagram a screenshot⁶⁴ of a conversation between unidentified persons regarding Margera; Courville commented, describing “[L]ima [J]evremović” as an “alleged trafficker.” On April 19, 2022, Courville published on Instagram screenshots⁶⁵ of excerpts from a tabloid story about Margera’s recovery, with a section of the article highlighted. Courville commented on the screenshot regarding Margera’s recovery, in relevant part, by stating: “#FreeBam” and “#EndHumanTrafficking.”

⁶⁴ <https://www.instagram.com/p/CciJ3HsuFIX/> (Accessed September 5, 2023.)

⁶⁵ <https://www.instagram.com/p/CciIldlukcw/> (Accessed September 1, 2023.)

107. These statements are defamatory as they imply that Jevremović is trafficking Margera. While these statements might ordinarily be readily understood as hyperbole, Courville’s repeatedly holding herself out as a legal expert and her repeated emphasis of her use of legal language in its technical sense would reasonably lead a significant portion of her audience to understand the implications of these statements literally.

108. On April 18, 2022, Courville published a screenshot⁶⁶ of a highlighted excerpt from an article discussing the application of Iceland law and whether Margera’s and his wife’s marriage is legally recognized. A commenter on this image asked:

where are his parents?

to which Courville responded:

helping the criminals [sic] girl.

109. This statement is defamatory insofar as Courville’s constant association of Jevremović with Margera’s treatment naturally leads Courville’s audience to understand “girl” in this context to reference Jevremović; these false statements are defamatory insofar they assert that Jevremović is a criminal, which she is not.

110. On April 3, 2022, Courville posted a screenshot⁶⁷ of an excerpt of a celebrity tabloid article to Instagram, in which she highlighted a portion of the title stating, “Margera Used To Have A \$45 Million New Worth”; Courville commented on the photo, saying:

I heard forced rehab is expensive... I learned that from Lima from @meetAURA. Who now has @bam__margera in a forced rehab. WhT are the chances!! That’s just my conspiracy theory lol 🤪 #FreeBam.

111. By linking the cost of rehabilitation, as described by Jevremović, to the supposed depletion of Margera’s net worth, Courville is falsely characterizing Jevremović as depleting

⁶⁶ <https://www.instagram.com/p/Ccf9UdxuHYc/> (Accessed September 1, 2023.)

⁶⁷ <https://www.instagram.com/p/Cb5djK4FXNI/> (Accessed September 8, 2023.)

Margera's money rather than assisting with treatment for a substance abuse disorder. Such a statement is defamatory as it falsely imputes a profit motive to Jevremović which most people would find condemnable.

112. On March 30, 2022, Courville published to Instagram a screenshot⁶⁸ of comments made to Instagram; a commenter asked:

forced incarceration, experimenting on homeless & celebrity cash cows to fund her treatment centers? If im [sic] wrong on anything[,] please [let me know.]

Courville responded:

I mean... that's my impression, so if you're wrong[,] I am too.

113. Courville thereby explicitly adopted the commenter's false statements. Jevremović does not engage in experiments on the homeless and has no treatment centers; further, the pejorative term "celebrity cash cows" implies that Jevremović is exploiting celebrities for money. Such false statements are defamatory as they indicate dishonesty and insofar as people hold low opinions of those who exploit others.

114. On April 4, 2022, Courville published to YouTube a video entitled "What Happened to Bam Margera? EXCLUSIVE POLICE REPORT"⁶⁹ in which she defames Jevremović. At 27:39, Courville describes Margera's transfers between treatment facilities and states:

Honestly, some of it looks criminal. Now I'm a lawyer, but what do I know. It looks criminal to me.

115. This statement defames Jevremović insofar as Courville repeatedly identifies Jevremović as responsible for Margera's treatment, and insofar as Courville, invoking the authority she commands as a lawyer, describes aspects of Margera's treatment as criminal.

⁶⁸ <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed September 8, 2023.)

⁶⁹ <https://www.youtube.com/watch?v=b3beCLgl6aw> (Accessed September 8, 2023.)

116. On July 15, 2022, Courville published to YouTube a video entitled “Bam’s Guardian LASHES OUT | Breaks Silence on #FreeBam – Reaction”⁷⁰ in which she reacts to Jevremović’s public statements addressing, *inter alia*, Courville’s harassment (“the relentless harassment, leaking all of my private information all over the internet, threats to my family and clients, constantly reporting my social media accounts and businesses and the over 14,000 emails that have cluttered my inbox”). At 05:05 Courville states

I also know Lima [is] a liar.

117. This is defamatory insofar as Courville expressly impugns Jevremović’s honesty without basis.

118. Later in the same video, at 26:08, Courville addresses the discrepancy between Jevremović’s description of Rabb’s cause of death and the official autopsy report and states:

[Jevremović] can’t keep track of her story. And that’s what happens when you lie; you have to keep track of the lies you told.

119. This is defamatory insofar as it expressly characterizes Jevremović’s statements as lies, when in reality, Jevremović’s alleged false statements emanated from an email with conflicting information which Jevremović read from in a video Courville cites as inaccurate.⁷¹ Clark County did not provide Jevremović with the complete autopsy report citing HIPAA law as the reason for not providing the full document—which Courville somehow obtained and publicized in attempts to discredit Jevremović. In reality, Jevremović read from the information she was provided.

120. On July 8, 2022, Courville published to YouTube a video [entitled “Bam's Family Breaks Silence on #FreeBam | Jess and April Margera SPEAK OUT.”](#)⁷² At 6:10, she states:

⁷⁰ <https://www.youtube.com/watch?v=5EPVSf8Kdlo> (Accessed September 8, 2023.)

⁷¹ <https://www.youtube.com/watch?v=IQTPnbpsAIc> (Accessed September 8, 2023.)

⁷² <https://www.youtube.com/watch?v=Nr3e0RKY6lg> (Accessed September 8, 2023.)

I do not say theories without being very explicit that it is my opinion or my belief or my suspicion. I never say anything as if it is a fact when I don't know it to be a fact.

121. Courville thus emphasizes that her statements are accurate and factual. At 15:59, Courville describes herself as

the woman who dared use her, volunteer her time to help [Marger] out of a literal human trafficking situation

122. This is defamatory insofar as it characterizes Jevremović's imposition of a guardianship as human trafficking, a crime. While such statements might ordinarily be susceptible to an interpretation as hyperbole, Courville disclaims hyperbole by use of the term "literal," and she makes clear that if she did not intend for this statement to be taken literally, then she would have been "very explicit that it is my opinion or my belief or my suspicion," and she would "never say [this statement] as if it is a fact if [she didn't] know it to be a fact."

123. On April 18, 2022, Courville posted a screenshot⁷³ of anonymous comments to Instagram, captioning the photo:

Looks like team con is planning to traffic @bam_margera for a "few more months". #freebam

124. This statement is defamatory insofar as it characterizes Jevremović as a trafficker and a con. Given Courville's repeated statements regarding Jevremović's guardianship, viewers would clearly understand "team con" to refer to Jevremović.

125. On July 1, 2022, Courville published a video to YouTube entitled "Virtual Reality Hell: The Amanda Rabb Story."⁷⁴ At 31:02 she states:

I operate in one absolute thing and that is truth. Lima didn't tell the truth.

⁷³ <https://www.instagram.com/p/Ccf9opHlvNm/>

⁷⁴ https://www.youtube.com/watch?v=xdfvYfuEUa&list=PLO9hzkqACQ1yoJ_RPLakmoyil7pb84_Uq&index=2

126. By these statements, Courville impugns Jevremović's honesty, and emphasizes that Courville's statements are accurate and factual.

127. In this same video, at 31:31, Courville states:

That was not true. Amanda was hand chosen because they had the cooperation of Larry Rabb.

128. These statements are defamatory insofar as they impugn Jevremović's honesty.

129. On September 10, 2022, Courville published a video to YouTube entitled "Lima Jevremovic Made A Video About Me,"⁷⁵ in which she states at 17:53:

I joke about stuff, and I make light of situations, but like, make no mistake, this isn't drama, this is very serious.

130. By this statement, Courville emphasizes that her statements are not jokes or hyperbole but should be understood as accurate and factual by her viewers.

131. Courville reiterates this in the same video at 18:15, when she states:

It's very serious, a woman is dead, a woman has passed under [Jevremović's] care.

132. This statement both defames Jevremović by characterizing her as personally responsible for wrongdoing, *i.e.*, a woman's death, and reiterates that Courville's statements are serious and should be taken as such.

133. On July 30, 2023, Courville published to YouTube a video titled "Missing Twin NEEDS Help | *URGENT*."⁷⁶ At 1:37, she states:

Another story is the Amanda Rabb story and the fact that Lima did take over Amanda's life and healthcare in order to give her an experimental treatment and Amanda Rabb, as you know, did not survive the treatment. She passed away in the treatment center, in the AURA treatment center, and then Lima lied about how Amanda died and she never really gave a good explanation for that.

⁷⁵ https://www.youtube.com/watch?v=RtwiHx8_oMA

⁷⁶ https://www.youtube.com/watch?v=7d_8hiUYONQ (Accessed September 8, 2023.)

134. These false statements are defamatory insofar as they impugn Jevremović's honesty.

135. Later in this same video, at 10:55 she states:

This has turned into a me versus everyone, everybody in the family, all the – no, it's the truth versus lies.

136. Courville thus emphasizes that her statements are accurate and factual.

137. Courville also states in this video, at 11:12:

Not only do we have one unexplained death that has happened in Lima's care, we also now have allegations of sex trafficking of people that Lima has purported to be in care of, and Bam Margera told me himself he was held against his will for months without access to a phone, computer, internet, any of it.

138. These statements are defamatory insofar as they characterize Jevremović as a criminal, which she is not.

139. Courville then goes on to claim, "it's about the truth for me," before reading a letter which she states she sent to 25 to 50 different outlets and encourages viewers to also send, which states:

I am a lawyer and independent journalist with a few YouTube channels.⁷⁷

140. Courville thus further relies on her legal background to support that her statements are accurate and factual; they are not.

141. Courville's letter, as read aloud in this video and posted in the video's description via a Google Doc for her followers to send, also states:

[Bam Margera] told me that he was held in rehab against his will and denied medical treatment.⁷⁸

⁷⁷ https://www.youtube.com/watch?v=7d_8hiUYONQ (Accessed September 8, 2023.)

⁷⁸ https://www.youtube.com/watch?v=7d_8hiUYONQ (Accessed September 8, 2023.)

142. This statement is defamatory insofar as Courville identifies Jevremović as responsible for Margera’s treatment and characterizes such treatment as criminal.

143. On August 14, 2023, Courville published a video to YouTube entitled “*SHOCKING* Presentation by Lima from AURA (NEW)”⁷⁹ in which she references her legal background, stating at 20:50:

I think I scored in the 96th or 97th percentile on [the LSAT], like I scored in the top like three or four percent of everyone who took the test.

144. This statement serves to legitimize Courville’s statements as factual and accurate, which they are not.

145. In this same video, Courville repeats the same false, defamatory statements detailed herein about Jevremović with regard to Ms. Rapp’s death.

146. In an August 2022 video, Defendant Benipal appeared alongside Courville on the “That Surprise Witness” YouTube channel and personally made false or misleading statements regarding Jevremović and regarding Ms. Rapp’s death, such as Benipal’s statement at the 10:07 mark: “Had [Jevremović] left Amanda alone, Amanda might be alive today...”.⁸⁰

147. This statement is defamatory insofar as Courville identifies Jevremović as responsible for Ms. Rabb’s death, which has no basis in truth.

148. Jevremović’s reputation and business endeavors has been negatively impacted, if not destroyed by Defendants’ actions, and she has unduly suffered humiliation, emotional distress, anger, embarrassment, sadness, frustration, fear, loss of income, chagrin, severe anxiety, stress, shame, mortification, hurt feelings, sleeplessness, and physical manifestations thereof resulting from Defendants’ above-described actions. Jevremović’s associated damages

⁷⁹ <https://www.youtube.com/watch?v=Emm1WfIdZbE> (Accessed September 5, 2023.)

⁸⁰ <https://www.youtube.com/watch?v=5EPVSf8KdIo> at 10:07 (Accessed September 5, 2023.)

are in an amount to be proven at trial, but in no event less than the jurisdictional minimum of this Court.

149. Defendants knew or should have known each of these statements to be false at the time the statement was made, and thus, Defendants acted with actual malice sufficient to support an award of punitive damages.

150. Defendants intentionally and maliciously made the above-quoted false statements over several months in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications. Defendants made these false statements in a wanton and willful disregard of Jevremović's rights. Defendants knew or should have known at the time that they made the statements that serious harm would arise from Defendants' conduct, and Defendants, with knowledge of the harm caused, continued such conduct. Defendants' outrageous, egregious, and exceptionally wrongful behavior should be punished in the form of punitive damages to deter them from similar wrongful conduct in the future.

SECOND COUNT

LIBEL

(By Plaintiff AURA against All Defendants)

151. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 150 as though fully set forth in this paragraph.

152. On April 27, 2022, Courville published to Instagram an image⁸¹ showing a digital message sent to her in which the message-sender criticizes Courville for spreading falsehoods. An anonymous commenter asked,

When has Lima Jevremović [sic] . . . ever up held [sic] HIPPA [sic]?

⁸¹ <https://www.instagram.com/p/Cc22uuMsobQ/>

Courville responded:

never not once [sic].

153. This statement is defamatory insofar as it references Jevremović's work on behalf of AURA, and it asserts that Jevremović, and by extension, AURA, violate the Health Insurance Portability and Accountability Act ("HIPAA"). Because AURA's products are used in mental health treatment, they must (and do) comply with HIPAA. Courville's statements are defamatory *per se* insofar as they falsely allege that AURA is irresponsible with its clients' private information and that AURA does not follow black-letter law. Such statements would damage AURA's esteem and reputation amongst patients, healthcare practitioners, investors, and others, and would lead third parties to think that AURA is incompetent in its business or engages in misconduct in its business operations.

154. On April 27, 2022, Courville republished an image⁸² containing another's statements to Instagram regarding Rabb, Margera, and Jevremović; an anonymous commenter asked:

Are [Jevremović and AURA,] using homeless people with addictions to experiment on them for their [YouTube] channel?

and Courville unequivocally affirmed the commenter's statement:

yes.

155. By affirming the commenter's statement, Courville effectively adopted the statement as her own. This false statement is defamatory as it explicitly states that Jevremović and AURA are experimenting on homeless individuals, implying that they are doing something inhumane. It further implies that Jevremović and AURA are dishonest insofar as Courville's statement contradicts Jevremović's stated reason for providing care to Rabb.

⁸² <https://www.instagram.com/p/Cc3REs7FNGJ/>

156. On March 31, 2022, Courville published to Instagram an excerpt⁸³ from a video in which Jevremović read Rabb's cause of death as a seizure disorder. Courville pauses and adds commentary, including, at 0:10; Jevremović states:

Rabb never had seizures prior to being homeless.

Courville comments and states:

But I think another way of saying that is she never had seizures prior to using AURA.

157. Courville thus seeks to falsely imply that AURA's products caused Rabb's seizures and potentially caused her death.

158. On March 31, 2022, Courville published on Instagram a photo⁸⁴ of Rabb wearing virtual reality headgear and participating in a "Virtual Reality Exposure Therapy Session using AURA." A person commented on the photo with interest in the virtual reality-based treatment, and Courville responded:

the issue is that Rabb was forced to do this treatment under threat of going to prison. She was set up against her will with the help of the government do be used as a test subject and marketing tool. I agree with you completely that it 'seems cool'. What's not cool is taking away someone's choice for their own treatment.

159. This statement is defamatory insofar as it falsely states that patients have the AURA system forced upon them as a test-subject; such a statement carries negative implications about AURA as people are generally opposed to being forced to test healthcare treatments.

160. On April 1, 2022, Courville published an excerpt⁸⁵ from a program for a virtual reality conference which included Jevremović and her then-company, which worked with virtual reality in jail and prison settings. Courville commented on the image:

⁸³ <https://www.instagram.com/p/CbxaISSgRxR/>

⁸⁴ <https://www.instagram.com/p/CbxIzVsOT-D/>

⁸⁵ <https://www.instagram.com/p/Cb02KZuAJEe/>

Seems like Lima has BEEN looking for a way to use experimental virtual reality apps on vulnerable populations that she views as ‘problematic’. #InvestigateAURA #FreeBam #RabbRabb.

161. This statement is defamatory insofar as it characterizes Jevremović and AURA as experimenting on vulnerable populations whom Jevremović purportedly views as “problematic” and insofar as it contradicts Jevremović’s stated reasons for working with those suffering from mental health disorders (thereby impugning her honesty); such a characterization is highly offensive and falsely imputes a motive to Jevremović and to AURA which most people would find condemnable.

162. On March 30, 2022, Courville published another excerpt from a video⁸⁶ in which Jevremović describes the use of AURA products in connection with Rabb’s treatment. Jevremović explains that AURA provides its products at no cost and uses the data collected for research purposes, and Rabb would have the opportunity to serve as a case study. Courville commented on the video:

Rabb did not consent to being used as a research object. She was court ordered into a conservatorship after Lima, mark Laita, and Rabb’s dad SET HER UP. This same woman petitioned to put Bam into a conservatorship. #FreeBam #RabbRabb #InvestigateAURA

163. These statements are defamatory as they falsely state that Jevremović and AURA forced Rabb to test AURA products – people are generally opposed to being forced to test healthcare tools. Such a statement negatively impacts AURA’s reputation.

164. On February 22, 2022, Courville published to YouTube a video⁸⁷ in which she defames Jevremović and AURA. At 49:55, Courville falsely states:

[Jevremović] forces people by court order to use [AURA’s] tools.

165. This statement is defamatory insofar as it falsely states that Jevremović on behalf of AURA imposes conservatorships on people as a means to force people to use AURA’s tools (from

⁸⁶ <https://www.instagram.com/p/CbvGodsJLtE/>

⁸⁷ <https://www.youtube.com/watch?v=hAPdBs398vc> (Accessed September 5, 2023.)

which AURA and Jevremović would purportedly profit); people will generally understand this statement to be defamatory insofar as forcing guardianships and conservatorships on people for the purpose of generating profits is generally condemnable behavior.

166. AURA's reputation has been negatively impacted due to Defendants' above-described actions; AURA has lost substantial investments, opportunities, and income resulting from Defendants' defamation.

167. Defendants intentionally and maliciously made the above-quoted false statements over several months in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications. Defendants made these false statements in wonton and willful disregard of AURA's rights, with knowledge of their falsity or reckless disregard for whether the statements were true. Defendants knew or should have known at the time they made the statements that serious harm would arise from their conduct, and Defendants, with knowledge of the harm caused, nevertheless continued such conduct unabashedly. Defendants' outrageous, egregious, and exceptionally wrongful behavior should be punished in the form of punitive damages to deter them from similar wrongful conduct in the future.

168. These false statements expose AURA and its CEO, Jevremović, to hatred, contempt, and the loss of the goodwill and confidence felt toward them by others.

169. Furthermore, these false statements have a tendency to injure, and did in fact injure, Plaintiffs' business operations in the addictions recovery and mental healthcare industry, including but not limited to their use of therapist-guided exposure therapy implementing virtual reality technology and telehealth solutions.

170. These statements are entirely false. As a result of Defendants' publications, Plaintiffs have suffered reputational harm in an amount to be proved at trial.

171. As a result of Defendants' publications, AURA has lost business opportunities in an amount to be proven at trial.

172. Defendants' conduct in publishing and republishing the above statements was actuated by actual malice and/or accompanied by a wanton and willful disregard of the effect their statements would have on Plaintiffs' reputations, which foreseeably might be harmed by Defendants' republications. Such conduct entitles Plaintiffs to an award of punitive damages under N.J.S.A. 2A:15-5.9, *et seq.*, to both punish and deter Defendants' wanton conduct in an amount to be proven at trial.

THIRD COUNT

Invasion of Privacy – Intrusion upon Seclusion

(By Plaintiff Lima Jevremović against All Defendants)

173. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 172 as though fully set forth in this paragraph.

174. Plaintiff has alleged (i) an intentional intrusion (ii) upon the seclusion of another that is (iii) highly offensive to a reasonable person.⁸⁸

175. Plaintiff has successfully alleged an intentional intrusion, where she was substantially certain she lacked any indicia of consent to commit the intrusive acts alleged herein. Plaintiff has alleged that Defendants released personal information without any permission to do so, and to the contrary, over Plaintiff's vehement objections.

176. Specifically, Defendants have released highly personal, private information regarding Plaintiff and her family, including Plaintiff's family's home addresses, the name and address of the church Plaintiff attends in Los Angeles, Plaintiff's phone number, and Plaintiff's

⁸⁸ *Hennessey v. Coastal Eagle Point Oil Co.*, 129 N.J. 81, 609 A.2d 11, 17 (1992) (citing Restatement (Second) of Torts § 652B).

social security number, as well as the names and photos of Plaintiff's husband, sisters, mother, and mother-in-law. Moreover, Defendants' release of Plaintiff's personal information, and encouragement of Courville's followers⁸⁹, has caused further intrusions and invasions into Plaintiff's privacy via death threats and text messages of dead bodies from unknown numbers, strangers showing up uninvited and unannounced at Plaintiff's home, and drones entering and surveilling Plaintiff's property to watch Plaintiff and her family.

177. Plaintiff has alleged herein that Defendants have intruded into Plaintiff's otherwise private seclusion that the plaintiff has regarding her person or private life. Specifically, Defendants have intruded upon Plaintiff's family life, home and property, private information, and church and religious life.

178. The above-listed intrusions on Plaintiff's privacy, such as the release of her private contact information and social security number, would undoubtedly be highly offensive to the ordinary reasonable person.

179. Plaintiff has suffered immense emotional and financial harm as a result of Defendants' invasion into her privacy as described herein.

FOURTH COUNT

Invasion of Privacy – False Light

(By Plaintiff Lima Jevremović against All Defendants)

180. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 179 as though fully set forth in this paragraph.

181. Defendants gave publicity to a matter concerning Plaintiff that Defendants knew was false.

⁸⁹ June 27, 2023 YouTube video with Courville touting the contributions of her followers to her activities in digging into Jevremovich's personal life: <https://www.youtube.com/watch?v=Vh6j4YHIxoE>.

182. Defendants either knew that the publicized material was false and would place Plaintiff in a false light or acted with reckless disregard as to whether the publicized defamatory statements were false and/or with reckless disregard for the false impression created by the publicized defamatory statements. Specifically, Defendants made the defamatory statements and publications regarding Plaintiff with knowledge or reckless disregard of their falsity as described in Counts I and II.

183. The defamatory statements made by Defendants so misrepresented Plaintiff's character, history, activities and/or beliefs that a reasonable person in Plaintiff's position would find the material highly offensive. In fact, significant numbers of people who have viewed these defamatory statements have been so affected by them that Plaintiff has received death threats and text messages of dead bodies from unknown numbers, strangers have shown up uninvited and unannounced at Plaintiff's home and recently, drones entered Plaintiff's property and hovered above Plaintiff and Plaintiff's mother to surveil them. A reasonable person would not only find Defendants' statements highly offensive but would be offended and shocked by the effect Defendants' statements have had on other persons, and Defendants' continuing to make such statements knowing that Plaintiff faced such egregious threats to her safety based thereon.

184. The publicity caused by Defendants' defamatory statements was the cause of injuries, damages, and/or losses sustained by Plaintiff.

FIFTH COUNT

Domestic Violence Act ("DVA")—Harassment (N.J.S.A. § 2C:25-19(a)(13))

(By Plaintiff Lima Jevremović against All Defendants)

185. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 184 as though fully set forth in this paragraph.

186. Harassment under the DVA occurs where a person with purpose to harass another, “[m]akes, or causes to be made, a communication or communications anonymously or at extremely inconvenient hours, or in offensively coarse language, or any other manner likely to cause annoyance or alarm.” N.J.S.A. § 2C:33–4(a). “[A]nnoyance” under that subsection means to “disturb, irritate or bother.” *State v. Hoffman*, 149 N.J. 564, 580 (1997). The provision in N.J.S.A. 2C:33–4(a) prohibiting conduct communicated in any manner likely to cause annoyance or alarm encompasses where those modes of communicative harassment “are also invasive of the recipient’s privacy.” *Id.* at 583.

187. The Act further provides that the court shall consider, among other factors: the existence of immediate danger to person or property and the existence of a verifiable order of protection from another jurisdiction. N.J.S.A. 2C:25–29(a). Here, a Temporary Restraining Order is attached as Exhibit 1, that has been issued pending a hearing on September 25, 2023, based on the harm that has been caused to Plaintiff in California. *See* Exhibit 1.

188. As alleged in multiple instances of harassing conduct above, Defendants have falsely suggested that Jevremović had an OnlyFans page with pornographic films and photographs (she does not and never has), which false suggestion would not have been made except as to cause annoyance or alarm, and which was invasive of the Plaintiff’s privacy.

189. As alleged above, Defendants have published to the Internet Jevremović’s social security number, date of birth, home phone number, multiple private home addresses of Jevremović and her family members, along with urgings to her followers that would be suggestive that the pieces of highly personal and sensitive information are to be used in nefarious ways. Even though Courville has occasionally issued brief disclaimers regarding the usage of this personal identifying information, the context of the release of the information would suggest that the sole purpose of such releases was to frighten, intimidate and harass Jevremović.

190. As a result, Plaintiff and her family have been forced to relocate from their homes multiple times, hire around-the-clock security, and have obtained a Temporary Restraining Order based on the aforementioned conduct of Defendants (*See* Exhibit 1), that has thus caused Plaintiff financial harm, as well as pain and suffering.

SIXTH COUNT

Domestic Violence—Cyber-harassment (N.J.S.A. § 2C:25-33-4.1)

(By Plaintiff Lima Jevremović against All Defendants)

191. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 190 as though fully set forth in this paragraph.

192. Cyber-harassment under the DVA occurs where making a communication in an online capacity via any electronic device or through a social networking site and with the purpose to harass another, the person, and knowingly sends, posts, comments, requests, suggests, or proposes any lewd, indecent, or obscene material to or about a person with the intent to emotionally harm a reasonable person or place a reasonable person in fear of physical or emotional harm to his person; or threatens to commit any crime against the person or the person's property. N.J.S.A. § 2C:25-33-4.1.

193. Here, among the other allegations pleaded above, Courville did post to her @ThatSurpriseWitness Instagram posted on April 22, 2023, which on information is operated by Defendants Courville, Benipal, and That Surprise Witness TV LLC, a lewd photograph⁹⁰ falsely suggesting that Jevremović had an OnlyFans⁹¹ page—and linking to pornographic films and photographs that are not of Jevremović; Defendants knowingly used such lewd and indecent

⁹⁰https://www.instagram.com/p/CciejDiFsTI/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 9, 2023).

⁹¹ <https://www.complex.com/life/a/joshua-espinoza/what-is-onlyfans-explainer> (Accessed September 9, 2023).

material solely with the purpose of causing emotional harm to Jevremović, and without any legitimate purpose.

194. Defendants combined to conduct their outrageous, cruel, and malicious doxing and cyber-harassment of Plaintiff, including the actions mentioned herein, with the knowledge that their publications could cause Plaintiff to suffer harassment and humiliation.

195. The acts of Defendants resulted in damage to Plaintiff.

SEVENTH COUNT

Intentional Infliction of Emotional Distress

(By Plaintiff Lima Jevremović against Defendant Courville)

196. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 195 as though fully set forth in this paragraph.

197. The New Jersey Supreme Court in the seminal case *Buckley v. Trenton Saving Fund Soc.* sets forth the common law cause of action for the tort of intentional infliction emotional distress: one must intentionally or recklessly commit an extreme and outrageous act which proximately causes plaintiff severe emotional distress. *Buckley v. Trenton Saving Fund Soc.*, 111 N.J. 355, 366 (1988).

198. The nature of the act or conduct must be “so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.” *Id.* (quoting Restatement, Second, Torts, § 46).

199. Similarly, there is a rather rigorous, while objective, standard for how severe the distress must be that is suffered by plaintiff: “so severe that no reasonable man could be expected to endure it.” *Cole v. Laughrey Funeral Home*, 376 N.J.Super. 135, 148 (App.Div.2005) (“The tort of intentional infliction of emotional distress requires emotional trauma that is severe.”).

200. Here, there is no doubt that Defendants’ distribution of Plaintiff’s home address, her mother’s home address, and myriad other releases of private information, including Plaintiff’s phone number and social security number, was released with the aim of inflicting devastation and emotional distress on Plaintiff and her family—and that Defendants’ actions did in fact cause devastation and emotional distress.

201. Further, the publication of a photo falsely suggesting Plaintiff was distributing pornographic materials via OnlyFans was but one example of the conduct alleged above, plainly released to torment and distress Plaintiff; Defendants’ conduct in publicly touting this obscene lie did in fact cause devastation and emotional distress.

202. Defendants combined to conduct their outrageous, cruel, and malicious doxing and cyber-harassment of Plaintiff, with the knowledge that their publications could cause Plaintiff to suffer harassment and potential violence.

203. The acts of Defendants resulted in damage to Plaintiff. In fact, as a direct result of Defendants’ distribution of Plaintiff’s and her family’s private information, Plaintiff and her family have been forced to move homes, relocate to different states, and hire around-the-clock security.⁹²

EIGHTH COUNT

Negligent Infliction of Emotional Distress

(By Plaintiff Jevremović against All Defendants)

204. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 203 as though fully set forth in this paragraph.

⁹² Danielle Keats Citron, Addressing Cyber Harassment: An Overview of Hate Crimes in Cyberspace, 6 Case W. Res. J.L. Tech. & Internet at 4 (2015): <https://scholarlycommons.law.case.edu/jolti/vol6/iss1/3> (“Victims fundamentally change their lives. They move because they no longer feel safe at home.”)

205. For a claim of negligent infliction of emotional distress, a plaintiff must plead that the defendant had a duty to the plaintiff and that the defendant breached that duty, proximately causing the plaintiff's injury of genuine and substantial emotional distress. *Lascurain v. City of Newark*, 349 N.J.Super. 251, 277 (App.Div.2002).

206. Whether the defendant has a duty of care to the Plaintiff depends on whether it was foreseeable that the plaintiff would be seriously mentally distressed. *Id.*

207. Here, Defendants were aware of the risk of serious mental distress to Jevremović as a result of Defendants' distribution of Plaintiff's home address (three different private addresses after Jevremović has been forced to move as a result of Courville's doxing), Jevremović's mother's home address⁹³, Jevremović's sister Dahlia's private home address, along with release of links to pornography with the false suggestion that it was Jevremović in the pornography, and the myriad false statements and releases of private information as pleaded above.

208. As such, Defendants breached their duty of care to Jevremović as they combined to jointly conduct outrageous, cruel, and malicious doxing and cyber-harassment of Jevremović despite knowledge that their conduct had caused Jevremović severe emotional distress, and despite knowledge that Jevremović's reporting the conduct to law enforcement in three states.

209. The acts of Defendants resulted in damage to Plaintiff and her family, including but not limited to, forcing Plaintiff and her family to relocate and 24-7 hire security.

210. Defendants conduct herein has caused Jevremović extensive additional mental anguish⁹⁴ and financial harm.

⁹³ <https://www.youtube.com/watch?v=CLiEyC0WK8> (Accessed September 5, 2023).

⁹⁴ Danielle Keats Citron, Addressing Cyber Harassment at 4-5: ("Victims experience severe emotional distress, anxiety, and depression.").

NINTH COUNT

Unfair Competition

(By Plaintiff AURA against All Defendants)

211. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 210 as though fully set forth in this paragraph.

212. The actions of Defendants as alleged above were done deliberately and intentionally.

213. The actions of Defendants misled the public regarding AURA and/or products in violation of the common law of unfair competition of the State of New Jersey. Specifically, Defendants have actively spread defamatory statements and falsehoods about AURA, while Courville simultaneously began contributing to another online health company, Giddy.

214. The actions of Defendants as alleged above were committed with the intention of deceiving or defrauding the public in violation of the common law of unfair competition of the State of New Jersey.

215. Specifically, Defendants actions have effectively frozen investment in AURA, forestalled further development of AURA's new health-based business, and acted to siphon potential investors interested in a health start-up away from AURA.

216. Defendants' actions as alleged herein have caused and will continue to cause irreparable damage and injury to AURA if not enjoined by this Court.

TENTH COUNT

Unfair Competition

(By Plaintiff Jevremović against All Defendants)

217. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 216 as though fully set forth in this paragraph.

218. The actions of Defendants as alleged above were done deliberately and intentionally to bring down Jevremović and to siphon off Jevremović's followers and viewers to Defendants' "That Surprise Witness" social media channels, and to deceive or defraud the public into following Defendants' social media channels instead of Jevremović, in violation of the common law of unfair competition of the State of New Jersey.

219. The actions of Defendants misled the public regarding Jevremović as a social media influencer in the health space, in violation of the common law of unfair competition of the State of New Jersey.

220. Specifically, Defendants have actively spread defamatory statements, falsehoods, and misleading statements about Jevremović, where negative commentary receives more traction online than positive content. At the same time, Courville contributed to another competing online health company, Giddy, that was also in the health space.

221. Specifically, Defendants' actions have effectively destroyed Jevremović's business as a YouTube commentator herself, forestalling Jevremović's growth as commercially successful social media personality in the health space, after Defendants' social media blitzkrieg demonizing Jevremović, and siphoning viewers and followers to Defendants' social media channels, and profiting thereby in the form of Patreon sponsors, advertising on Defendants' YouTube channel and other methods of monetization that Defendants wrongfully obtained at the harm and expense of Jevremović.

222. Defendant's actions as alleged herein have caused and will continue to cause irreparable damage and injury to AURA if not enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for Judgment as follows:

1. For general damages according to proof, but not less than \$75,001;
2. For compensatory damages according to proof;
3. For special damages for damage to reputations, losses of business opportunities, and losses of investment opportunities according to proof, but not less than the jurisdictional minimum of this Court;
4. For the maximum available punitive damages per Plaintiff per cause of action;
5. For a permanent injunction to remove all statements and publications adjudged libelous and to estop Defendants from publishing additional actionable statements under the causes of action alleged;
6. For pre- and post-judgment interest as allowed by law;
7. For costs of suit and such other and further relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury for all matters triable.

Respectfully submitted,

s/Elliot D. Ostrove

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Attorneys for Plaintiffs Lima Jevremović and
Autonomous User Rehabilitation Agent, LLC

Dated: September 11, 2023

NEW JERSEY DISTRICT COURT LOCAL RULE 11.2 CERTIFICATION

I, Lima Jevremović, on my own behalf and on behalf of Autonomous User Rehabilitation Agent, LLC (“AURA”), hereby declare the following:

1. I am a Plaintiff in the present case, a citizen of California and the United States of America.
2. I am also the CEO of Autonomous User Rehabilitation Agent, LLC and, as such, I am authorized to make statements on the Company’s behalf.
3. I have fully reviewed the foregoing Second Amended Complaint, and aver that the matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

I hereby certify that the matter in controversy in the foregoing Second Amended Complaint is not the subject of any other civil action pending in any court, or of any pending arbitration or administrative proceeding, with the exception of an application for Domestic Violence Restraining Order filed in Family Court in California by Claimant Lima Jevremović against Respondent Brittany Courville at Case Number 23STR005881, which thus far resulted in a Temporary Restraining Order attached as Exhibit 1, and which was served upon Defendant on September 11, 2023.

I certify under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on September 11, 2023.

/s/ Lima Jevremović

Lima Jevremović, on my own behalf, and
on behalf of Autonomous User
Rehabilitation Agent, LLC